



Air Quality Permitting Statement of Basis

June 6, 2006

Tier I Operating Permit No. T1-060508

**Idaho National Laboratory
Idaho Falls**

Facility ID No. 023-00001, 011-00022

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Final

Table of Contents

1.	PURPOSE	3
2.	FACILITY DESCRIPTION/CLASSIFICATION	3
3.	APPLICATION SCOPE	3
4.	SUMMARY OF EVENTS	3
5.	PERMITTING HISTORY	4
6.	PERMIT ANALYSIS	4
7.	PERMIT REVIEW	5
8.	REGISTRATION FEES	5
9.	RECOMMENDATION	5
	APPENDIX A - AIRS DATA ENTRY FORM	6

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this Tier I administrative permit amendment in accordance with IDAPA 58.01.01.381.

This action is an administrative amendment to Tier I operating permit Permit No. T1- 03052 issued June 28, 2005, the terms and conditions of which no longer apply.

2. FACILITY DESCRIPTION/CLASSIFICATION

The facility description and classification has not changed. Details are provided in the June 28, 2005, statement of basis that supports the issuance of the initial Tier I operating permit. The area classification, regulatory review and emissions description also remain the same.

3. APPLICATION SCOPE

INL has requested the following administrative changes to the Tier I operating permit:

- 1) Change the name of the permittee from Idaho National Laboratory Research Center to Idaho National Laboratory Site (INL) and remove all INEEL acronyms and replace them with INL.
- 2) Remove the reference to individual names in the responsible official list but retain the title of the persons who are responsible officials.
- 3) Change error in reference to permit condition 2.9 in permit condition 2.7 to the correct reference which is permit condition 2.7.
- 4) Change permit conditions 8.3.8 and 8.3.9 to require monitoring of emissions per calendar year instead of per consecutive 12-months consistent with the statement of basis.
- 5) Remove reference to BNFL in permit tables 11.2 and 11.3.
- 6) Change the name of some of the operational units at the facility:
 - a) ANL-W to Materials and Fuels Complex (MFC)
 - b) WROC to Critical Infrastructure Test Range Complex/Power Burst Facility (CITRC/PBF)
 - c) TRA to Reactor Technology Complex (RTC).

4. SUMMARY OF EVENTS

August 3, 2005	DEQ received an INL letter describing proposed changes to the Tier I operating permit and describing compliance strategies.
October 28, 2005	DEQ sent a letter to INL responding to proposed compliance strategies and proposed permit changes.
April 7, 2006	DEQ received INL's request to administratively change the Tier I operating permit.
May 26, 2006	Draft Tier I operating permit issued to INL for comment
May 31, 2006	Received INL comments on draft permit via email

5. PERMITTING HISTORY

June 28, 2005

Initial Tier I Operating Permit No. T1- 030520 issued.

6. PERMIT ANALYSIS

All of the permit changes described in the application scope have been made and are all self explanatory with the exception of the monitoring change correction in Permit Conditions 8.3.8 and 8.3.9. These permit conditions were changed to reflect the original intent of the permit as described in the June 28, 2005, statement of basis.

6.1 Existing Permit Condition 8.3.8 and 8.3.9

8.3.8 The permittee shall maintain a record of the gallons of lube oil used per consecutive 12-month period at TAN 679-025, TAN 679-026, and TAN 679-027 (Rolling Mill). This record shall be maintained onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

8.3.9 The permittee shall calculate and record the VOC emissions per calendar year from TAN 679-022, TAN 679-023, TAN 679-024, TAN 679-025, TAN 679-026, and TAN 679-027 (Rolling Mill and Laboratory). The most recent five-year compilation of data shall be maintained onsite and shall be made available to DEQ representatives upon request.

6.2 Revised Permit Condition 8.3.8 and 8.3.9

8.3.8 The permittee shall maintain a record of the gallons of lube oil used per calendar year at TAN 679-025, TAN 679-026, and TAN 679-027 (Rolling Mill). This record shall be maintained onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

8.3.9 The permittee shall calculate and record the VOC emissions per calendar year from TAN 679-022, TAN 679-023, TAN 679-024, TAN 679-025, TAN 679-026, and TAN 679-027 (Rolling Mill and Laboratory). The most recent five-year compilation of data shall be maintained onsite and shall be made available to DEQ representatives upon request.

These changes were made to reflect the original intent of the monitoring requirements as stated in the June 28, 2005, Statement of Basis. That statement of basis contains a response to comment received on the draft permit regarding monitoring in Section 8 of the permit:

“All annual emission limits (tons per year) in Section 8 of the Tier I operating permit were issued in a PTC on May 20, 2004. These emissions limits were issued at a time when “year” was not defined by the Rules for the Control of Air Pollution in Idaho. The statement of basis does not indicate these emission limits were originally issued as “annual calendar year limits”.

“For clarification purposes the Tier I operating permit specifies whether these annual emissions limits are based on a “calendar year” or based on “any consecutive 12-months”. The annual emission limits that are greater than 0.05 tons per year are clearly specified as limits per “any consecutive 12-months” and emission limits less than 0.05 tons per year are now clearly specified as limits per “calendar year”. The associated monitoring and recording has also been changed to reflect these changes. These determinations of whether the annual emissions limits are per “calendar year” or “consecutive 12-months” are based on DEQ’s need to determine compliance in a timely manner considering the potential to emit of the emission unit. For those emissions units with emission limits less than 0.05 DEQ has determined that compliance determined at the end of each calendar year is sufficient, all other emissions

units must demonstrate compliance per consecutive 12-months consistent with how DEQ regulates all other facilities.”¹

The VOC emissions limits corresponding to the monitoring requirements of Permit Conditions 8.3.8 and 8.3.9 are less than 0.05 tons per year; therefore, these permit conditions were changed to be consistent with the original intent and now require monitoring “per calendar year” instead of “per consecutive 12-month period”

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

DEQ is provided a draft copy of the permit to the Idaho Falls Regional. No changes were suggested.

7.2 Facility Review of Draft Permit

DEQ provided INL a draft permit for review on May 26, 2006. Comments were received from INL via email on 5/31/06, all INL comments were incorporated into the final permit.

7.3 Public Comment

Tier I administrative amendments do not require notice to the public or affected states in accordance with IDAPA 58.01.01.381.02.c. Therefore, a public comment period and affected state review is not being provided.

8. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10. Therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

9. RECOMMENDATION

Based on the Tier I operating permit application and review of state rules and federal regulation, staff recommend that DEQ issue Tier I Operating Permit No. T1-060508 to INL. This permit administratively amends the facility’s existing Tier I operating permit.

DP/bf Permit No. T1-060508

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¹ Response to comment #63 in June 28, 2005 Statement of Basis for INL Tier I permit
T1- Statement of Basis – INL, Idaho Falls

Appendix A
AIRS Data Entry Form
T1-060508

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B		B				U
NO _x	A	A	A			A	U
CO	A	A				A	U
PM ₁₀	B						U
PT (Particulate)	B		B				U
VOC	B		B				U
THAP (Total HAPs)	A			X			U
			APPLICABLE SUBPART				
			Db and Dc	H and M			

- ^A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- ^B = Actual and potential emissions below all applicable major source thresholds.
- ^C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).
- ^{NA} = Not applicable as defined in IDAPA 58.01.01.579, constructed prior to baseline dates.